

**Wittels
McInturff
Palikovic**

March 15, 2024

Via ECF

Hon. Victoria Reznik
United States District Court
Southern District of New York
300 Quarropas St.
White Plains, NY 10601

MEMO ENDORSED

Re: *Melville v. HOP Energy, LLC*, No. 21 Civ. 10406 (KMK) (VR)

Dear Judge Reznik,

Counsel for Plaintiff and the Proposed Class and Defendant submit this joint status letter in accordance with the Court's March 6, 2023 Order.

By way of background, during the March 6 conference the Court directed the parties to meet and confer about Defendant's remaining ESI production, a new proposed deadline for substantial completion of document discovery, and whether the parties intended to submit a case management plan in *Mullaney*.

On March 12, the parties met and conferred and Plaintiffs made a proposal regarding Defendant's remaining ESI production. Earlier today, Defendant responded to Plaintiffs' proposal, which response Plaintiffs are evaluating. The parties will update the Court on or before March 22, 2024 if they are able to reach agreement on the remaining ESI production, the new proposed deadline for substantial completion of document discovery, and coordination of the *Melville* and *Mullaney* matters.

During the March 12 meet and confer, the parties also discussed and declared impasse on Rule 30(b)(6) sequencing issues pertaining to the parties' ongoing discussions regarding Defendant's production of customer contracts. Next week Plaintiffs anticipate filing a letter motion regarding this impasse and may file additional letter motions if the parties are unable to achieve compromise on the other outstanding discovery issues on or before March 22.

Thank you for the Court's attention to this matter.

Respectfully submitted,

WITTELS MCINTURFF PALIKOVIC

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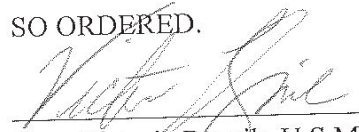
Attorneys for Plaintiff and the Proposed Class

The parties' request is **GRANTED**.

By 3/22/24, the parties shall submit another status letter regarding Defendant's remaining ESI production, a new proposed deadline for substantial completion of document discovery, and whether the parties intend to submit a proposed case management plan in *Mullaney*.

Dated: 3/18/24

SO ORDERED.



Hon. Victoria Reznik, U.S.M.J.